

1 KATHRYN C. NEWMAN
Nevada Bar No. 13733
2 kathryn.newman@ogletree.com
3 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
10801 W. Charleston Blvd., Suite 500
4 Las Vegas, NV 89135
Telephone: 702.369.6800
5 Fax: 702.369.6888
6 *Attorneys for Defendant,*
7 *ORACLE AMERICA, INC.*

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 BRIAN HERTZ, an individual,
11 Plaintiff,

12 vs.

13 ORACLE AMERICA, INC., a Foreign
14 Corporation,
15 Defendant.

CASE NO.: 2:25-cv-00360-APG-DJA

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANT TO
FILE RESPONSE TO PLAINTIFF'S
COMPLAINT**

16 Pursuant to Local Rules IA 6-1 and IA 6-2, Defendant Oracle America, Inc. ("Defendant")
17 and Plaintiff Brian Hertz ("Plaintiff") hereby requests an extension of time, up to and including April
18 16, 2025, for Defendant to file its response to Plaintiff's Complaint (ECF. No. 1). The present
19 deadline for Defendant to file its response is March 17, 2025. This is the parties' first request for
20 an extension of time for Defendant to file its response.

21
22 ///

23
24 ///

25
26 ///

27
28 ///

Defendant respectfully requests this extension in order to have the time to fully research the facts and circumstances underlying this case, to allow the parties time to explore resolution, and not for purposes of delay. Good cause exists to extend the response deadline. Therefore, the parties respectfully request a thirty day extension of time up to and including April 16, 2025 for Defendant to file its response to Plaintiff's Complaint.

DATED this 12th day of March, 2025.

HKM EMPLOYMENT ATTORNEYS LLP

/s/ Michael Arata

Michael Arata
Nevada Bar No. 11902
101 Convention Center Dr., Suite 600
Las Vegas, NV 89109

*Attorneys for Plaintiff,
Brian Hertz*

DATED this 12th day of March, 2025.

OGLETREE, DEAKINS, NASH, SMOAK & STEWART,
P.C.

/s/ Kathryn C. Newman

Kathryn C. Newman
Nevada Bar No. 13733
10801 W. Charleston Blvd., Suite 500
Las Vegas, NV 89135

*Attorneys for Defendant,
Oracle America, Inc.*

ORDER

IT IS SO ORDERED.



DANIEL J. ALBRECHTS
UNITED STATES MAGISTRATE JUDGE

DATED: 3/13/2025